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**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA**

RAVALLI COUNTY REPUBLICAN CENTRAL COMMITTEE, GALLATIN COUNTY REPUBLICAN CENTRAL COMMITTEE,)	Case No. CV 14-0058-H-BMM
SANDERS COUNTY REPUBLICAN CENTRAL COMMITTEE, DAWSON COUNTY REPUBLICAN CENTRAL COMMITTEE,)	PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION
STILLWATER COUNTY REPUBLICAN CENTRAL COMMITTEE; RICHLAND COUNTY REPUBLICAN CENTRAL COMMITTEE;)	
CARBON COUNTY REPUBLICAN CENTRAL COMMITTEE; FLATHEAD COUNTY REPUBLICAN CENTRAL COMMITTEE;)	
MADISON COUNTY REPUBLICAN CENTRAL COMMITTEE; BIG HORN COUNTY REPUBLICAN CENTRAL COMMITTEE;)	
MONTANA REPUBLICAN PARTY,)	
Plaintiffs,)	
v.)	
LINDA McCULLOCH, in her official capacity as Montana's Secretary of State, <i>et al.</i> ,)	
Defendants.)	

TO THE CLERK AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs hereby move this Court for a preliminary injunction prohibiting Defendants from enforcing Montana's mandatory open primary law against the Montana Republican Party. Per Local Rule 7.1, counsel for Defendants has been notified of this motion and opposes it.

Accompanying this motion is a Brief in Support of Plaintiffs' Motion for Preliminary Injunction as well as the following exhibits:

<u>Description of Document</u>	<u>Exhibit No.</u>
Transcript of Deposition of Montana GOP Executive Director Chris Shipp & Deposition Exhibits (7/24/15)	1
Report of Plaintiffs' Experts, Prof. Kyle Saunders & Prof. Steven Greene (6/4/15)	2
Report of Defendants' Expert, Prof. Christopher Muste (7/14/15)	3
Transcript of Deposition of Senate Majority Leader Matthew Rosendale (8/3/15)	4
Transcript of Deposition of MEA-MFT President Eric Feaver & Deposition Exhibits (6/26/15)	5
Transcript of Deposition of Scott Boulanger (7/23/15).....	6
Declaration of Brad Molnar (5/29/15).....	7
Declaration of Republican House Majority Leader Keith Regier (5/28/15).....	8

Declaration of Republican Senate Majority Leader Matthew Rosendale (5/29/15)	9
Transcript of Deposition of Prof. Kyle Saunders (7/30/15)	10
Declaration of Scott Boulanger (6/3/15)	11

DATED: August 28, 2015

Respectfully submitted,
Monforton Law Offices, PLLC

/s/ Matthew G. Monforton
Matthew G. Monforton

Attorney for the County Central
Committee Plaintiffs

The James Brown Law Office, PLLC

/s/ James E. Brown
James E. Brown

Attorney for Plaintiff Montana Republican Party

CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 28th day of August, 2015, that a copy of the foregoing will be delivered this day via the Court's ECF system to the following:

TIMOTHY C. FOX Montana Attorney General
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DATED: August 28, 2015

Respectfully submitted,
Monforton Law Offices, PLLC

/s/ Matthew G. Monforton
Matthew G. Monforton

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Committee Plaintiffs

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/s/ James E. Brown
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Attorney for Plaintiff Montana Republican Party